

MAR 12 1996

**MEMORANDUM**

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**CH2M HILL**

**PREPARED FOR:** Sylvia Burges/EPA Region 10

**DATE:** March 7, 1996

**COPIES TO:** Edwin Liu/RP  
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## TECHNICAL STATUS REPORT

**CH2M HILL**

**PREPARED FOR:** Sylvia Burges/EPA Region 10  
**COPIES TO:** Byung Maeng/Ecology  
**PREPARED BY:** Liz Luecker/CH2M HILL  
**DATE:** March 7, 1996  
**SUBJECT:** Rhône-Poulenc Monthly Status Report  
**SITE NAME AND LOCATION:** Rhône-Poulenc Inc./Seattle Plant  
Tukwila, WA  
**REPORTING PERIOD:** February 1 through February 29, 1996  
**PROJECT:** 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

### Progress Made This Reporting Period

#### *Task P1-Project Management*

The EPA status report was faxed to EPA on February 6. Hard copies of the EPA status report were sent out on February 6.

#### *Task A2-Applicable Regulations and Permits*

##### Storm Water Discharges.

No storm water from the 800,000-gallon tank was discharged during February because the water level in the tank at the point where sediments would be discharged. Since the tank has an open top, additional storm water will accumulate in the tank during rain events. Therefore, there will probably be one more discharge of storm water to Metro before the tank is cleaned. RP plans to clean the tank by June.

The one-half to one inch of sediment in this tank was sampled on February 13 and allowed to settle. The water was poured off, and the remaining sediment was sent to Sound Analytical on February 20 for analysis. The sediment contained: 10,000 mg/kg TPH (EPA Method 418.1), 5,600 mg/kg total copper, 2.9 mg/kg PCBs (Aroclor 1254),

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0.71 mg/l TCLP barium, and 0.17 mg/l TCLP lead. All other TCLP metals were not detected. This sediment is not regulated as a Washington State or EPA dangerous waste.

#### Channel Dredging.

The Duwamish Waterway main channel was dredged during the week of February 26. The Corps of Engineers performs this maintenance dredging every two years; however, sediments in Slip No. 6 are not dredged by the Corps during this dredging.

#### ***Task A3-Interim Measures***

##### PCB Ditch Excavation.

A report describing the PCB ditch excavation and the analytical results is currently being developed by Terra Nova Environmental Sciences. The three piles of PCB-contaminated soil generated during excavation of the PCB ditch will be disposed of on March 6.

Several conversations between RP, Hays Consulting, CH2M HILL, and AETS occurred during February to define the regulatory status of the PCB-contaminated soil. Based on historical information obtained from former employees, information from the manufacturer of the air compressor fluid, and interpretations from EPA HQ TSCA branch, this soil will be classified as a non-TSCA-regulated PCB-containing waste. A letter documenting the rationale for this classification is attached and was sent to AETS on February 27.

##### LNAPL.

After the reappearance of a layer of LNAPL last month, RP decided to install a product recovery filter in well H10. This 1.5-inch O.D. filter was obtained from Westwind Resources Ltd. The filter and reservoir pipe are constructed of Schedule 40 PVC. The filter is equipped with a hydrophobic membrane that resists the passage of water through the screen. The screen is 14 inches long, and the reservoir is three feet long. The product recovery filter was installed on February 26. With the exception of diameter, this product recovery filter is the same as one that was installed at the site several years ago.

LNAPL is being recovered on a regular basis from the product recovery filter. The following amounts of LNAPL have been recovered to date: February 26 - 240 ml, February 27 - 1,000 ml, and February 28 - 500 ml.

RP monitored the wells for LNAPL on February 27. The wells monitored for LNAPL were: H10, MW-12, H11, DM-7, H9, G3, B6, MW-14, MW-15, MW-17, MW-18, MW-19, and MW-20. At 10:45 AM 1000 ml of LNAPL was bailed from H10; as a result, when LNAPL was measured in the well at 3:45 PM, only a film of LNAPL was seen. The sample from well MW-18 contained 0.09 inches of LNAPL, while the sample from well H11 had a sheen. The remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

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### ***Task S1-Miscellaneous Field Support***

#### **PCB-Contaminated Sewer Wash Water.**

Twelve drums of PCB-contaminated sludge and eight of PCB-contaminated rinse water from cleaning Rain-for-Rent tanks were sampled on February 26, and a composite sample of combined sludge and rinsate was sent to Rhône-Poulenc Environmental Services' Peiser Laboratory. The laboratory will analyze the sample for disposal parameters, and, if the results are acceptable, this sludge and rinsate will be included for disposal along with the API Separator Sludge.

#### **Sewer Wash Water in Rain-for-Rent Tank.**

On February 6, sewer wash water in Rain-for-Rent tank #239617 was sampled at five depths, to within 6 inches of the bottom. Sound Analytical analyzed these samples for copper; the results ranged from 8.5 to 8.9 mg/l copper. There was no correlation between the concentration of copper and the depth of the sample. On February 12, a sample of the wash water was filtered through new 5- and 50-micron filters. The filtrate contained 8.1 mg/l copper. After standing for an additional nine days undisturbed, the wash water was sampled at a depth of 28 inches below the water surface. The sample contained 8.2 mg/l copper, still above the Metro discharge limit of 8.0 mg/l copper. On February 21, RP contacted Metro to see if this was low enough to discharge to Metro; Metro said it wasn't.

RP is investigating different options for disposal of this water.

### ***Task S3-Laboratories***

Due to problems with the existing laboratory, CH2M HILL is in the process of re-procuring analytical services. The bid package was sent to IEA, ARI, S-Cubed, Quanterra, and QAL. RP will finalize laboratory selection in March.

#### **Deliverables Submitted**

The January Progress Report was submitted to U.S. EPA on February 6, 1996.

#### **Progress Planned For Next Reporting Period**

### ***Task A2-Applicable Regulations and Permits***

#### **Leasing Arrangements.**

The PCB ditch area will be paved by Lakeridge Paving once excavation of contaminated soils is complete.

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Trees will be planted along the north and south boundaries of the site to comply with the City of Tukwila's requirements. This planting is expected to happen March 7.

Storm Water.

Sediments in the bottom of the 800,000 gallon open-top tank will be cleaned out and managed with the non-PCB-contaminated wash water sediments. This cleaning may be held off until the rainy season is over so that solidification of the sediments before landfilling can be minimized.

***Task A3-Interim Measures***

PCB Ditch Excavation.

Three piles of PCB-contaminated soil will be disposed of on March 6. A revised profile for the soils stating their non-TSCA regulated status should be received from Chemical Waste Management by March 4.

LNAPL.

Continue to monitor LNAPL thicknesses in selected monitoring wells monthly.

***Task A8-Round 3 Data Technical Memorandum***

RP is awaiting comments from EPA and Ecology on the Round 3 Tech Memo.

***Task S1-Miscellaneous Field Support***

Drum Disposal.

The PCB-contaminated soil piles were large enough that they could not be taken offsite in one truck load. As a result, Chemical Waste Management approved the disposal of some of the wastes previously held in drums to try and fill out the second load. The following wastes were taken out of the storage drums and placed directly in the bulk load (in the case of PPE and filters) or solidified with fly ash (in the case of the sludges and soils) and then placed in the bulk load. These previously drummed wastes were: one drum of PCB-contaminated filters from cleaning PCB-contaminated wash waters, various containers of PPE, two partial drums from cleaning outfall 4, two partially full drums of well rehabilitation sediment, nine drums of sludge from cleaning the non-PCB-contaminated wash water tank, and eight drums of soil from the PCB ditch excavation. The water layer in the sludge drums was decanted off and placed in four drums for later treatment and disposal with other wastewaters.

Drums remaining onsite contain sludge and rinsate from cleaning the Rain-for-Rent tanks and used activated carbon. These wastes include: 12 drums of sludge and eight drums of

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rinsate from cleaning the PCB-contaminated wash water tanks, 12 drums of rinsate and five drums of sludge from cleaning the non-PCB-contaminated wash water tank, four drums of water decanted from the non-PCB-contaminated sludge drums (described above), and two drums of used activated carbon. The drums will either be sent off site or, in the case of wastewaters, filtered and discharged to Metro, if possible.

API Separator Clean Out.

A bid from CEcon to perform the cleaning of the API Separator is expected in early March. The Facility is also waiting on a decision from Rhône-Poulenc Environmental Services as to whether the PCB-contaminated sludge and rinsate can be sent with the API Separator sludge for a combined shipment. The wastes would be incinerated at one of RP's Basic Chemicals Incinerator Services facilities. Cleaning of the API separator and disposal of API separator waste is expected to occur in April.

PCB-Contaminated Sewer Wash Water and Sludge.

Once Rhône-Poulenc Environmental Services approves the PCB-contaminated sewer rinsate and sludge, the waste will be disposed of with the API Separator sludge. Approval is expected in March.

Sewer Wash Water in Rain-for-Rent Tank and  
Outfall 4 Wash Water in Aluminum Tank.

Approximately 18,000 gallons of sewer wash water and sludge remain in the Rain-for-Rent tank, and approximately 1,000 gallons of outfall 4 wash water are in the aluminum tank. RP is currently deciding whether to re-filter the wash water or have an outside contractor remove and dispose of the wash water. Once the wash water and sludge are removed and disposed of, the tanks will be cleaned and wipe tested.

*rhône-p/MSR/02-96EPA*

RHONE POULENC - MARGINAL WAY FACILITY  
MONTHLY LNAPL SURVEY LOG  
Floating Product Layer Thickness in Feet

Date Sampled	H10	H1	MW12	H11	DM7	H9	H6	DM2A	DM2B	DM8	A9	DM3A	DM3B	A2	A4	DM4	B4	B2	DM5	B1A	B1B	C1	DM6	B5	G3	G1	B6	MW13	MW14	MW15	MW16	MW17	MW18	MW19	MW20	DM1A	DM1B	E3		
6/7/94	0		0																																					
6/8/94	0		0																																					
6/17/94	Film	0	0.007	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0													
8/4/94	Film	Sheen	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0													
9/8/94	Film	0	Film	0.01	0	Sheen	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.021	0.005	0	0	0.01	0				
10/6/94	0	0	Sheen	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0.021	0				
11/3/94	0	0	0.005	0.005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0.01	0	0	0						
12/5/94	0	0	0	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0				
1/11/95	0.26 <sup>a</sup>	Sheen	Sheen	0.04 <sup>d</sup>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0.01 <sup>a</sup>	0	0	0	0	0	0			
2/17/95	2.01	0	0.16	Sheen	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0 <sup>b</sup>	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0		
3/23/95	0.01										0	0	0	0	0 <sup>c</sup>					0	0	0													0	0	Sheen <sup>c</sup>			
3/27/95		0	Sheen	0	0	0	0	0	0	0						0	0	0	0				0		0	0	0	0	0	0	0	0	0	0	0	0	0			
3/28/95																								0																
4/27/95	0.063	0	Film <sup>d</sup>	0		0				0	0	0	0	NA	0		0	0	0	0	0	0	0	0	0	0	0	0	0				0	0.063 <sup>c</sup>	Sheen	0				
4/28/95					0		0	0	0							0														0	0									
5/31/95	0.01	0	Film	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
6/30/95	Sheen <sup>d</sup>	0	Film	NA	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	Sheen	Sheen	0	0	0	0	0	0	0		
7/28/95																	0			0		0	0	0				0	0						0					
7/29/95	Sheen	0	Sheen	NA	0	0	0	0	0	0	0	0	0	NA	0	NA		0	0		NA					0	0	0			0	0	0	0	0	0	0			
8/26/95	Sheen	0	Sheen	0	0	0	0	0	0	0	0	0	0	NA	0	NA	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0		
9/29/95	0.03	0			0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	0	0	0		
10/4/95			Sheen <sup>d</sup>	<sup>a</sup>													0											0												
10/30/95	0.03	0	<sup>d</sup>	Film	0	0						0	0	0	0	0	0	NA	NA		0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0 <sup>f</sup>		
10/31/95							0	Sheen	Sheen	0	0							NA	NA	0						NA														
11/30/95	Film	0	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
12/31/95	0.2	0	Film	Sheen	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
1/3/96	1.17		<sup>a</sup>	Sheen	0	0																			0		NA		0	0		0	0	0	0	0	0	0		
2/27/96	Film <sup>e</sup>		0	Sheen	0	0																			0		0		0	0		0 <sup>f</sup>	0.09	0	0 <sup>f</sup>					

<sup>a</sup> Solinst Model 121 oil/water interface probe. After 1/11/95, all wells were monitored using this probe when significant LNAPL is present.  
<sup>b</sup> No sheen noted when measurement device was placed in clean water, but water turned light brown after probing.  
<sup>c</sup> Orange/rust colored residue on probe.  
<sup>d</sup> Globules.  
<sup>e</sup> Dark Phase.  
<sup>f</sup> Odor of decay.  
<sup>g</sup> 1000 mL of LNAPL were bailed from H10 at 10:45 am  
NA = Not accessible.



**NORTH AMERICAN SHARED SERVICES**

CN 5255  
PRINCETON, NJ 08543-5255

TEL: (609) 452-5000

**February 27, 1996**

**Mr. Jim Beck**  
**Account Manager**  
**AETS**  
**1120 Andover Park East**  
**Tukwila, Washington 98188**

**Dear Mr. Beck:**

As you know, Rhône-Poulenc Inc now has three soil piles at the East Marginal Way South facility that contain detectable levels of the PCB Aroclor 1254. Terra Nova performed the sampling of the piles. A total of four aliquots per soil pile were taken. Three of these aliquots were taken from 18 inches into and approximately one third up from the base of each pile; these aliquots were collected using a stainless steel trowel. The fourth aliquot was taken from the center of the top of the pile and approximately 24 inches into the pile; this aliquot was taken using a hand auger. The four aliquots per soil pile were composited into one sample per pile for analysis. The chemical analyses were performed by S-Cubed. The results of these three analyses (one composite sample per pile) are attached. The Aroclor 1254 concentrations in the samples from the three piles are 22.2 mg/kg, 28.7 mg/kg, and 7.88 mg/kg. No other Aroclors were detected.

The soils are from excavation of a pipe contaminated with Aroclor 1254. Although it is not known for sure, the contamination in the pipe is believed to have resulted from oil leakage from air compressors once located in a nearby building. The hydraulic oil used in these compressors was a product called Pydraul AC. According to Monsanto, the manufacturer of the product and the former owner of this site, this product contained the PCB Aroclor 1254. Compressors that used this type of hydraulic fluid were in routine use at the site from the time the plant was built in the 1950s until around 1979-80. Manufacturing of Pydraul AC containing Aroclor 1254 was stopped in 1971-1972, according to Monsanto. Based on conversations with former employees, the facility stopped using Pydraul AC in the early to mid 1970s; however, there is no record that the PCB-containing oil already in the compressors was actually replaced with non-PCB-containing oil. In about 1978-79, Monsanto issued an internal directive telling the plants to change out any PCB-containing oils in plant equipment, including air compressors.

Although the source of the Aroclor 1254 is believed to be the air compressors, Pydraul AC would probably have been added to the compressors only through the early to mid 1970s. The actual concentration of Aroclor 1254 in the compressor fluid that may have spilled after 1978 (i.e., post-TSCA) is not known. As indicated in a note from Hiroshi Dodohara/EPA Headquarters-TSCA Branch to Liz Luecker/CH2M HILL, "The PCB concentration of the source of the spill was not determined but has been determined to be post-TSCA or post-1978. Thus any material containing from 49 ppm to 10 ppm PCBs is not regulated [under TSCA] for disposal, [and] therefore exempt from the PCB Spill Clean-up Policy.... " The facility must consider state and local regulations which may be more stringent." Because of this, RP believes that the soils are not regulated under TSCA for disposal.





Mr. Jim Beck  
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Because the Arochlor 1254 contamination is believed to be from an air compressor and not a transformer or capacitor (as discussed in the definition of W001), RP also believes that the soils are not a Washington State Dangerous Waste.

RP would like to dispose of the soil piles as a non-TSCA PCB-containing waste at Chemical Waste Management's Subtitle C landfill at Arlington, OR, under Profile No. BP2464. We would like to make the following changes to this profile:

- 1) The telephone number for Sue Hays is (206)764-4450.
- 2) The billing address is:  
  
Edwin Liu  
Rhone-Poulenc Inc  
CN 5255  
Princeton, NJ 08543-5255
- 3) Add 0-20% adsorbent to the chemical composition.
- 4) Delete the "x" after "PCBs regulated by 40 CFR 761".
- 5) Add an "x" after "Bulk Solid".

If you have any questions, please call me at (609)452-5064, Sue Hays at (206)764-4450, or Liz Luecker at (206)453-5000.

Sincerely,



Edwin Liu

EL/ls

96-003LJB